

Exhibit 19

Statewide Scheduling * Legal Video * Internet Repository

1

THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

KATHY CLARK, AMY ENDSLEY, SUSAN *
GRIMMETT, MARGUERIETTE SCHMOLL, *
AND KEVIN ULRICH, ON BEHALF OF *
THEMSELVES AND ALL OTHERS *
SIMILARLY SITUATED, *

Plaintiffs, *

vs. *

* Civil Action No.
* 1:12-CV-00174-SS
*

CENTENE CORPORATION, CENTENE *
COMPANY OF TEXAS, L.C., AND *
SUPERIOR HEALTHPLAN, INC., *

Defendants. *

ORAL DEPOSITION OF
CORPORATE REPRESENTATIVE
ESMERALDA CAZARES-BAIG

OCTOBER 23, 2012

Statewide Scheduling * Legal Video * Internet Repository

23

1 St. Louis?

2 A. I do not know.

3 Q. Who would know the answer to that?

4 A. Probably somebody above me.

5 Q. Have you ever been to St. Louis?

6 A. Yes.

7 Q. Was it for Centene-type business, work-related
8 business?

9 A. Yes.

10 Q. Or was it just on vacation?

11 A. Work related.

12 Q. How many times have you been to St. Louis?

13 A. Approximately five.

14 Q. Over the course of what time?

15 A. Five years.

16 Q. And when you go to St. Louis -- do y'all use
17 the term corporate, we're going to go to corporate?

18 A. To the corporate office, yes.

19 Q. Whose office is -- who is corporate?

20 A. It's the name of the corporation.

21 Q. What is it?

22 A. It is a company that has different health
23 plans.

24 Q. I'm sorry, what is the name of that company?

25 A. Centene.

Statewide Scheduling * Legal Video * Internet Repository

24

1 Q. Centene what?

2 A. Corporation.

3 Q. So when you speak in terms of going to
4 corporate, you're talking about Centene Corporation?

5 A. Yes.

6 Q. And is that why you go to St. Louis, at the
7 behest of Centene Corporation?

8 A. No. We usually go -- the time I went -- I've
9 been -- the two times -- I've been five times that I
10 can remember, but the first two times were for
11 leadership training.

12 Q. Where was that held?

13 A. In the St. Louis office.

14 Q. The St. Louis office of who?

15 A. Centene.

16 Q. Corporation?

17 A. Corporation.

18 Q. What did that training entail?

19 A. They -- we had to -- we were assigned a couple
20 of books we had to read. We went there, we discussed
21 the books that we read and then got in different work
22 groups and did presentations.

23 Q. Who conducted the training?

24 A. A -- one of the trainers.

25 Q. Do you know who that person worked for?

Statewide Scheduling * Legal Video * Internet Repository

25

1 A. For Centene Management.

2 Q. For Centene Management or Centene Corporation?

3 A. No, Centene Management.

4 Q. The other times that you've been to St. Louis,
5 what was the purpose of those visits?

6 A. For meetings with the vice presidents of
7 medical management for other health plans.

8 Q. Other health plans within the Centene
9 organization?

10 A. Yes.

11 Q. Who conducted -- who facilitated those
12 meetings?

13 A. Christine Brzycki.

14 Q. And do you remember what other health plans
15 you met with?

16 A. There was a -- at different times there's been
17 different representatives from each health plan, but --

18 Q. Just name a few for me, if you can remember
19 them.

20 A. Sunshine State. I can tell you where they're
21 from. I don't necessarily know -- like Arizona,
22 Massachusetts.

23 Q. Arizona is Bridgeport. Is that right? Does
24 that sound familiar?

25 A. I'm sorry?